

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAMES HURT, JR.,

Plaintiffs,

**JOINT PROPOSED
VERDICT SHEET**

-against-

15-CV-7612 (PKC)

THE CITY OF NEW YORK, a municipal entity,
NYPD SERGEANT MICHAEL CONNIZZO
(Shield 1391, Tax ID 932485), and NYPD
POLICE OFFICER JOHN DOE.

Defendants.

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Plaintiff's Proposed Verdict Sheet

1. Unlawful Stop & Search against Michael Connizzo

Did Defendant Michael Connizzo unlawfully stop and search plaintiff James Hurt?

Yes _____

No _____

If you answered "No", proceed to question 2.

If yes, what amount of compensatory damages do you award to Plaintiff?

\$ _____

Did plaintiff James Hurt prove he is entitled to punitive damages as a result of the unlawful stop and search claim?

Yes _____

No _____

If you answered "No", proceed to question 2.

If yes, what amount of punitive damages is plaintiff entitled to?

\$ _____

2. False Arrest against Michael Connizzo

Did Defendant Michael Connizzo falsely arrest plaintiff James Hurt?

Yes _____ No _____

If you answered "No", proceed to question 3.

If yes, what amount of compensatory damages do you award to Plaintiff?

\$ _____

Did plaintiff James Hurt prove he is entitled to punitive damages as a result of the false arrest claim?

Yes _____ No _____

If you answered "No", proceed to question 3.

If yes, what amount of punitive damages is plaintiff entitled to?

\$ _____

3. Excessive Force against Michael Connizzo

Did Defendant Michael Connizzo use excessive force against plaintiff James Hurt?

Yes _____ No _____

If you answered "No", proceed to question 4.

If yes, what amount of compensatory damages do you award to Plaintiff?

\$ _____

Did plaintiff James Hurt prove he is entitled to punitive damages as a result of the excessive force claim?

Yes _____ No _____

If you answered "No", proceed to question 4.

If yes, what amount of punitive damages is plaintiff entitled to?

\$ _____

4. Assault against Michael Connizzo

Did Defendant Michael Connizzo assault plaintiff James Hurt?

Yes _____ No _____

If you answered "No", proceed to question 5.

If yes, what amount of compensatory damages do you award to Plaintiff?

\$ _____

Did plaintiff James Hurt prove he is entitled to punitive damages as a result of the assault claim?

Yes _____ No _____

If you answered "No", proceed to question 5.

If yes, what amount of punitive damages is plaintiff entitled to?

\$ _____

5. Battery against Michael Connizzo

Did Defendant Michael Connizzo commit a battery against plaintiff James Hurt?

Yes _____ No _____

If you answered "No", please go to question 6.

If yes, what amount of compensatory damages do you award to Plaintiff?

\$ _____

Did plaintiff James Hurt prove he is entitled to punitive damages as a result of the battery claim?

Yes _____ No _____

If you answered "No", please go to question 6.

If yes, what amount of punitive damages is plaintiff entitled to?

\$ _____

6. Unlawful Stop & Search against the NYPD

Did an NYPD officer unlawfully stop and search plaintiff James Hurt?

Yes _____ No _____

If you answered "No", proceed to question 7.

If yes, what amount of compensatory damages do you award to Plaintiff?

\$ _____

Did plaintiff James Hurt prove he is entitled to punitive damages as a result of the unlawful stop and search claim?

Yes _____ No _____

If you answered "No", proceed to question 7.

If yes, what amount of punitive damages is plaintiff entitled to?

\$ _____

7. Unlawful Detention against NYPD

Did an NYPD Officer unlawfully detain plaintiff James Hurt?

Yes _____ No _____

If you answered "No", proceed to question 8.

If yes, what amount of compensatory damages do you award to Plaintiff?

\$ _____

Did plaintiff James Hurt prove he is entitled to punitive damages as a result of the unlawful detention claim ?

Yes _____ No _____

If you answered "No", proceed to question 8.

If yes, what amount of punitive damages is plaintiff entitled to?

\$ _____

8. Excessive Force against NYPD

Did an NYPD officer use excessive force against plaintiff James Hurt?

Yes _____ No _____

If you answered "No", proceed to question 9.

If yes, what amount of compensatory damages do you award to Plaintiff?

\$ _____

Did plaintiff James Hurt prove he is entitled to punitive damages as a result of the excessive force claim?

Yes _____ No _____

If you answered "No", proceed to question 9.

If yes, what amount of punitive damages is plaintiff entitled to?

\$ _____

9. Assault against NYPD

Did an NYPD officer assault plaintiff James Hurt?

Yes _____ No _____

If you answered "No", proceed to question 10.

If yes, what amount of compensatory damages do you award to Plaintiff?

\$ _____

Did plaintiff James Hurt prove he is entitled to punitive damages as a result of the assault claim?

Yes _____ No _____

If you answered "No", proceed to question 10.

If yes, what amount of punitive damages is plaintiff entitled to?

\$ _____

10. Battery against NYPD

Did an NYPD Officer commit a battery against plaintiff James Hurt?

Yes _____ No _____

If you answered “No”, your deliberations are finished. Page 8 of this verdict form should be signed and dated by the foreperson and given to the Marshal.

If yes, what amount of compensatory damages do you award to Plaintiff?

\$ _____

Did plaintiff James Hurt prove he is entitled to punitive damages as a result of the battery claim?

Yes _____ No _____

If you answered “No”, your deliberations are finished. Page 8 of this verdict form should be signed and dated by the foreperson and given to the Marshal.

If yes, what amount of punitive damages is plaintiff entitled to?

\$ _____

Your deliberations are now finished. The verdict form should be signed and dated by the foreperson and given to the Marshal.

_____, 2019
New York, New York

FOREPERSON

End of Plaintiff’s Proposed Verdict Sheet

Defendants' Proposed Verdict Sheet

Question 1 (Unlawful Stop):

Has plaintiff proven by a preponderance of the credible evidence that the defendant Michael Connizzo unlawfully stopped him on July 2, 2014?

Yes _____ No _____

If you answered "No" proceed to Question 3.

If you answered "Yes" proceed to Question 2(a).

Question 2(a) (Damages: Unlawful Stop):

Has plaintiff proven by a preponderance of the credible evidence that he suffered compensatory damages as a result of being unlawfully stopped?

Yes _____ No _____

If you answered "No," proceed to Question 2(b).

If you answered "Yes," proceed to Question 2(c).

Question 2(b):

What amount of nominal damages, not to exceed one dollar, do you award plaintiff on his claim for unlawful stop? \$ _____ *Proceed to Question 3.*

Question 2(c):

State the total dollar amount of any actual compensatory damages that plaintiff has proven by a preponderance of the evidence he is entitled to recover for on his claim for the unlawful stop:

\$ _____ **Proceed to Question 3**

Question 3 (Unlawful Search):

Has plaintiff proven by a preponderance of the credible evidence that the defendant Michael Connizzo unlawfully searched plaintiff on July 2, 2014?

Yes _____ No _____

If you answered "No" proceed to Question 5.

If you answered "Yes" proceed to Question 4(a).

Question 4(a) (Damages: Unlawful Search):

Has plaintiff proven by a preponderance of the credible evidence that he suffered compensatory damages as a result of being unlawfully searched?

Yes _____ No _____

If you answered “No,” proceed to Question 4(b).

If you answered “Yes,” proceed to Question 4(c).

Question 4(b):

What amount of nominal damages, not to exceed one dollar, do you award plaintiff on his claim for unlawful search? \$ _____ **Proceed to Question 5.**

Question 4(c):

State the total dollar amount of any actual compensatory damages that plaintiff has proven by a preponderance of the evidence he is entitled to recover for on his claim for false arrest:

\$ _____ **Proceed to Question 5.**

Question 5 (Excessive Force):

Has plaintiff proven by a preponderance of the credible evidence that defendant Michael Connizzo intentionally subjected him to excessive force on July 2, 2014?

Yes _____ No _____

If you answered “No”, your deliberations are finished. Proceed to the instructions at the end.

If you answered “Yes,” as to either defendant proceed to Question 6(a).

Question 6(a) (Damages for Excessive Force):

Has plaintiff proven by a preponderance of the credible evidence that he suffered compensatory damages as a result of being subjected to excessive force?

Yes _____ No _____

If you answered “No,” proceed to Question 6(b).

If you answered “Yes,” proceed to Question 6(c).

Question 6(b):

What amount of nominal damages, not to exceed one dollar, do you award plaintiff on his excessive force claim?

\$_____

Your deliberations are finished. Proceed to the instructions at the end.

Question 6(c):

State the total dollar amount of any actual compensatory damages that plaintiff has proven by a preponderance of the evidence he is entitled to recover for being subject to excessive force:

\$_____

Your deliberations are finished. Proceed to the instructions at the end.

YOU HAVE REACHED A VERDICT. THE FOREPERSON SHOULD DATE AND SIGN THIS VERDICT FORM AND ADVISE THE MARSHAL.

Your foreperson must now sign and date the verdict sheet.

Signature of foreperson

Dated: New York, New York

____, 2019

End of Defendants' Proposed Verdict Sheet